

HEARING STATEMENT FOR MATTER 3: THE FIVE-YEAR LAND SUPPLY

**ON BEHALF OF DAVIDSONS
DEVELOPMENTS LTD**

1.0 Introduction

- 1.1 These representations are prepared by Bidwells LLP on behalf Davidsons Developments Ltd in response to the updated Matters and Issues set out by the Inspector on 24th August 2018. The Statement should be read in conjunction with our representations to the pre-submission Local Plan consultation dated 17th November 2017.

2.0 Matter 3: The Five-Year Land Supply

Issue 3.1 - What is the current 5-year housing land supply position?

- 2.1 The housing land supply position should reflect the emerging housing requirements as set out in the submitted Local Plan. It should take into account performance against this target since the start of the Plan period in 2011.
- 2.2 The following calculation of the land supply position has been based on the figures provided in the updated Housing Trajectory (as at March 2018). It is based on the figures as provided by the Local Planning Authority and does not take into account any change suggested to the housing requirement or to the delivery rates of site, such as those suggested in our Hearing Statement on Matter 2.
- a) Basic housing requirement: 557 dwellings per annum x 5 years = 2,785 dwellings;
 - b) Shortfall in deliver between 2011/12 and 2017/18: 857
 - c) Total requirement: a + b = 3,642
 - d) 20% buffer for persistent under delivery (c x 0.2) = 728 dwelling
 - e) Total requirement with buffer: c + d = 4,370 (equivalent to 874 dwellings per year)
 - f) Projected housing supply (from March 2108 trajectory: 4,289 dwellings
 - g) Housing land supply position: f/e = 98% **(4.9 years)**.
- 2.3 This is a 'best case position' for the Local Planning Authority as it is based on their forecast delivery rates, which will be debated at the hearing sessions. If alternative delivery rates for major sites are agreed, the 4.9 years land supply position will worsen. We understand the Local Planning Authority has updated their position on housing land supply and if this is the case we will look to comment on this at the hearing.

Issue 3.2 - Is the methodology basis for calculating the 5 YHLS sound?

- 2.4 The December 2017 calculation sets the baseline housing requirement at 532 dwellings per year. This is incorrect as the basis for the calculation should be the full housing requirement (557 including the allowance for Magna Park related growth), as required by paragraph 47 of the NPPF (2012). However, we note that in responding to the Inspectors initial questions, the Local Planning Authority acknowledge the land supply calculation will be based on the 557 requirement as

currently in the Plan. It therefore appears that the Local Planning Authority has recognised this error.

- 2.5 The December 2017 calculation included a shortfall of 712 homes based on under performance. It is unclear where this figure comes from as the updated housing trajectory shows the annual surplus/deficit against the housing target from 2011/12 and up until March 2017 is 880 dwellings (note, total shortfall is now 857 after a surplus of 23 dwellings in 2017/18).
- 2.6 For clarity, the shortfall included in the calculation should be the total shortfall in delivery against the current annualised housing requirement of 557 dwellings over all years from 2011/12 – the start of the Plan period.
- 2.7 The Local Planning Authority correctly use the Sedgefield method to deal with past under delivery, in accordance with the thrust of the Planning Practice Guidance.
- 2.8 The Local Planning Authority also correctly apply the 20% buffer based on past persistent under delivery.
- 2.9 Overall, as presented, the five-year land supply figure is inaccurate. This appears to be due to the data that has been fed into the calculation rather than an issue with the methodology. However, to clarify the position, this is an issue that will need to be discussed in more detail at the hearing sessions.

Issue 3.3 - Is the plan resilient and flexible enough to maintain 5 or more years' supply of deliverable housing land going forward?

- 2.10 At the current time, our calculation, under issue 3.1 above, suggests that the Local Planning Authority are unable to demonstrate a deliverable five-year land supply is in place. The Updated Housing Trajectory suggests that annual rate of delivery will increase significantly immediately up on adoption of the Plan.
- 2.11 Whilst it is likely the allocation of land will lead to improved delivery, as per our statement on Matter Two, there is a clear lack of flexibility in the supply side which puts the reliance of the land supply position in question. This can only be solved through the allocation of additional land, with a focus on those sites which are most deliverable – including those with house builder interest and a lack of constraints, and in areas where future allocations are not currently proposed in the Plan. Our client's land at Broughton Astley would be such a site.
- 2.12 The plan relies heavily on two Strategic Development Areas (SDAs) plus four further major allocations to meet a large proportion of need, particularly in the medium to long term. Three of the four major allocations are also in one settlement; Market Harborough. This strategy therefore relies heavily on a very localised housing market to absorb a significant level of growth. If the market cannot cope or there are any issues with infrastructure provision, this may lead to shortfall in delivery meaning housing need is not met.
- 2.13 Further allocations in sustainable settlements, such as Broughton Astley, would provide an element of flexibility in the land supply position and, particularly in the medium term, which is required to make the plan effective and therefore sound.

